

1020 Nineteenth Street NW
Suite 700
Washington, DC 20036
303 672-2821
fax: 202 293-0561



John W. Kure
Executive Director - Federal Policy and Law

Ex Parte

July 17, 2002

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

Re: Federal-State Joint Board on Universal Service,
Tenth Circuit Remand – CC Docket No. 96-45

Dear Ms. Dortch:

Yesterday, Craig Brown, Bill Johnston, Pamela Morton, Byron Watson and I held a conference call with William Scher, Katie King, Bryan Clopton, Jennifer Schneider, Narda Jones and Geoffrey Waldau from the Telecommunications Access Policy Division of the Wireline Competition Bureau regarding the above-referenced proceeding. Also participating were Peter Bluhm, Mary Newmeyer, Joel Shiffman, Mike Lee, Larry Stevens and Earl Poucher from various state commission staffs.

As shown in the attached documents, Qwest presented its proposal and rationale for complying with the Tenth Circuit's remand of the federal universal service funding mechanism for non-rural carriers. In summary, and in contrast to the other proposals in the record, Qwest's proposal achieves reasonably comparable rates both across state boundaries, as well as within states. Qwest described the three components of its plan. First, the federal mechanism would provide Tier 1 support for the costliest wire centers in the United States. Using a benchmark of three times the national average cost, the Tier 1 support is calculated at approximately \$470 million as distributed to the majority of states, thus providing states incentive to meet federally-set support conditions. Second, additional support is provided to eight states with unusually high costs. Tier 2 support amounts to approximately \$360 million. Finally as a condition for federal funding and following a two-year implementation phase, states must certify the reasonable comparability of rates and the removal of implicit support.

Additionally, Qwest hereby responds to several questions raised at the meeting.

Question: With regard to the equalization of business and residential rates that Qwest proposed as one condition for federal funding, do service quality differences impact the level of these rates?

Response: Qwest believes there is little, if any, cost differential between switched business and residential services. To the extent that such cost differences exist, those differences should of course be reflected in the rates. However, Qwest believes that any differences in rates between switched business and residential services are due primarily to continuing implicit subsidies in business rates, and not differences in service quality. Thus, in order to receive support, a state should be required to certify that business and residential rates in the state have been equalized, taking account of any differences in the costs of providing those services.

Question: In this presentation, Qwest proposed a total fund size of \$830 million. What would be the result of simply increasing the current fund to that size?

Response: In such a case, the benchmark would drop to \$26.02, but only 21 states would be eligible for federal support. Qwest's concern with this allocation is that the remaining states, which would receive no federal support, would be provided no incentive to achieve, in an explicit manner, "reasonable comparability." The Tenth Circuit was clear that the Commission is "obligated to create some inducement [through "carrot" or "stick"] ... to ensure that the states act."

Question: Is Qwest aware of any unreasonably high (*i.e.*, not reasonably comparable) rural rates today?

Response: After accounting for state and federal universal service support, Qwest is not aware of any unreasonably high rural rates today, though it has not studied this issue in detail. Qwest notes that Wyoming has established residential and business prices that are reflective of costs, in that costs in the most rural zones are significantly higher than in the more urban zones. Wyoming then relies upon the support provided from the federal mechanism, with the shortfall made up from the state mechanism, to achieve reasonable comparability.

The problem lies in states that have not yet equalized prices to cover costs. In these states, impermissible implicit subsidies are used to maintain reasonable comparability. As Qwest described in yesterday's meeting, the historical implicit subsidy system is being eroded, and, as RBOCs continue to lose business lines to competition, the existing cross-subsidy system will not support any delay in rebalancing and establishing a new federal mechanism.

Pursuant to FCC Rule 1.49(f), this Ex Parte is being filed electronically via the Electronic Comment Filing System for inclusion in the public record of the above-referenced docket.

Ms. Marlene H. Dortch
July 17, 2002
Page 3

Respectfully,

/s/

John W. Kure

cc: Peter Bluhm (pbluhm@psb.state.vt.us)
Mike Lee (mlee@state.mt.us)
Mary Newmeyer (mnewmeyer@psc.state.al.us)
Earl Poucher (poucher.earl@leg.state.fl.us)
Joel Shiffman (joel.shifman@state.me.us)
Larry Stevens (larry.stevens@iub.state.ia.us)

Bryan E. Clopton, Jr. (bclopton@fcc.gov)
Narda Jones (njones@fcc.gov)
Katie King (kking@fcc.gov)
William J. Scher (wscher@fcc.gov)
Jennifer Schneider (jschneid@fcc.gov)
Geoffrey Waldau (gwaldau@fcc.gov)

Attachments

Complying with the Tenth Circuit's Remand:

Qwest's Proposal for the Federal Universal Service Funding Mechanism for Non-Rural Carriers

July 16, 2002



Ex Parte Overview

- Tenth Circuit Decision
- Changes Required by the Decision
- Qwest's Two-Tier Plan
- States' Role
- Timeline

Status Quo Not an Option

- Tenth Circuit Decision: Commission must ensure reasonable comparability of rates within states, as well as among states
- Current methodology does not provide sufficient inducement, given that it provides funding to only a handful of states
 - Court rejected current approach of simply assuming that states will ensure reasonable comparability within their borders
 - Commission is “obligated to create some inducement [through “carrot” or “stick”]. . . to ensure that the states act.”

Status Quo Not an Option

- Existing support mechanism does not ensure “reasonable comparability” between urban and rural rates
 - Court indicated that urban-rural rate discrepancies of 70-80% would violate section 254
 - Basing federal subsidies only on statewide averages would impermissibly “substitute[] a comparison of national and statewide averages for the statutory comparison of urban and rural rates.”
- GAO study relied on by AT&T and Verizon based on implicit subsidies that will continue to be eroded
 - RBOC companies have already lost 26-33% of business lines, which are the lifeblood of existing cross-subsidy system
 - Commission does not have discretion to “wait and see”

Satisfying the Court's Mandate

- For these reasons, the FCC cannot simply “more fully explain” the rationale for its current methodology and must use this opportunity to *resolve* the Court's issues
- Qwest's mechanism will help the Commission define “reasonably comparable,” as well as create state inducements, as the court decision requires

Two-Tier Plan Overview

- Qwest has proposed a two-tier USF methodology
- **Tier 1** provides support for the most rural (costly) wire centers, resulting in federal support to the vast majority of states, and thereby enabling the required inducement for state action
- **Tier 2** provides supplemental support to states that cannot themselves ensure reasonably comparable rates, even with Tier 1 funding
- Retain current targeting approach and state's ability to petition for waiver of targeting rules.

Tier 1 Support

- Support is provided to a wire center to the extent its average total monthly cost exceeds a benchmark
- **Formula:** $S = (C_{wc} - B) * 12 * 0.76 * L_{wc}$
 - S = annual federal support for a wire center
 - C_{wc} = average wire center cost (calculated by a cost model)
 - B = benchmark
 - the constant 12 annualizes monthly wire center costs
 - the constant 0.76 converts total cost to intrastate cost
 - L_{wc} = number of lines in wire center

Tier 1 Support

- Thus, properly conditioned, Tier 1 support provides a broad based “carrot and stick” mechanism for the FCC to encourage states to ensure reasonable comparability between urban and rural rates
- For this presentation, Qwest has chosen a Tier 1 benchmark of \$69.09, which is 3x the national average cost of \$23.03
 - Allows for almost all jurisdictions (excluding NJ, RI and DC) to receive support, thus providing broad incentives for compliance with the statute
 - At the same time the benchmark minimizes the fund size while complying with the 10th Circuit’s order

Tier 2 Support

- Tier 2 provides supplemental support (i.e. in addition to Tier 1 support) to states with unusually high average costs, to ensure that all states have adequate resources to keep their rates reasonably comparable
- In particular, if a state's average total monthly cost exceeds a designated multiple (such as 1.5) of the average urban cost, then the state would receive federal support to keep its rates below that benchmark

Tier 2 Urban Benchmark Calculation

- In order to measure comparability, one must define urban and rural
 - Urban and rural are essentially defined by population density
 - Population density is highly correlated with lines / sq. mile
 - The SM model conveniently divides the nation into density groups with its Density Zone report
- Qwest proposes dividing urban vs. rural at the 650 to 800 lines / sq. mile density group because it is a convenient metric within the SM and because cost characteristics tend to change at this point
 - For example copper technology is often impractical in less dense areas and must be replaced by more expensive DLC technology

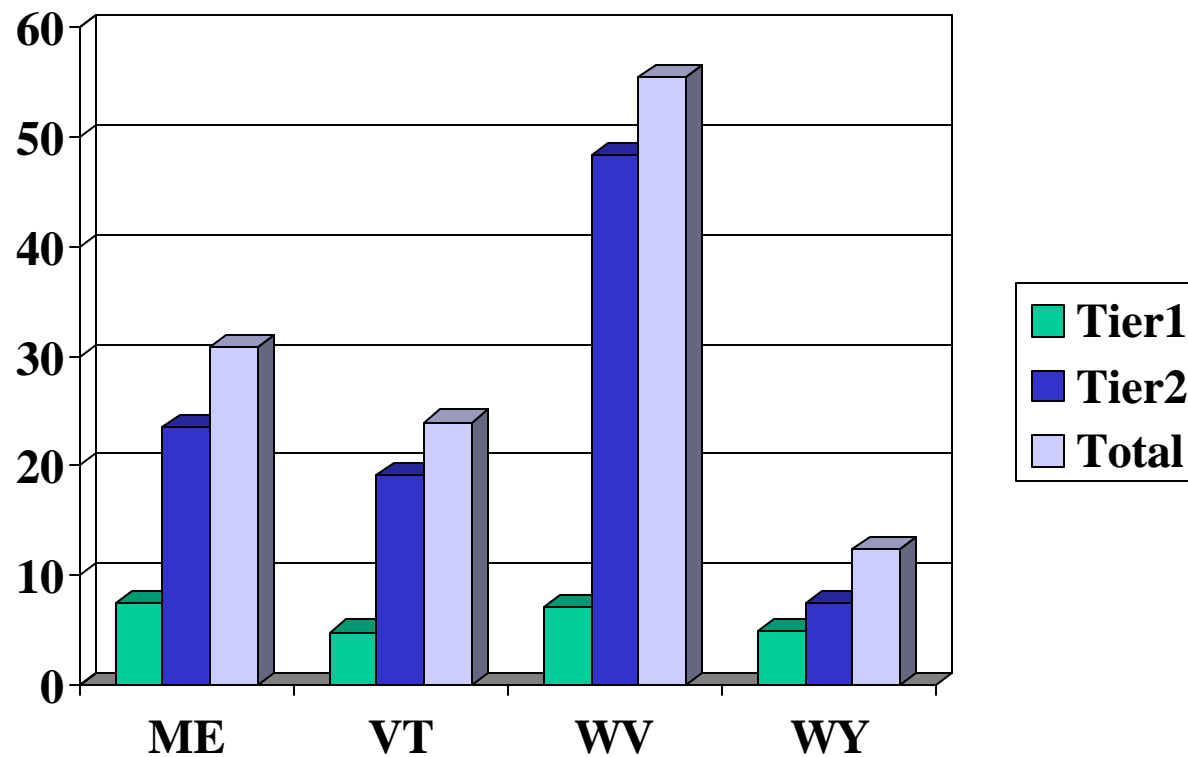
Tier 2 Urban Benchmark Calculation

- Both the SM's Density Zone and Wire Center reports are used to develop its proposed urban benchmark
- Using the Density Zone results for all non-rural ILECs, the 650 to 800 lines / sq. mile density group is equivalent to \$22.79 per month total cost
- Using \$22.79 as a dividing metric in the SM's Wire Center reports, wire centers whose total cost are below \$22.79 were deemed to be urban
- The SM computes the average cost of these wire centers to be \$18.80. Therefore, Qwest proposes that the average cost to serve urban customers be defined as \$18.80 per month

Tier 2 Calculation

- Qwest proposes the support benchmark be set at 150% of the average urban cost
 - Each state's threshold for support would be \$28.20 (1.5 x \$18.80)
 - This is less than the 70-80% difference rejected by Tenth Circuit
- **Formula:** $S2 = (Cs - S1 - B * 12 * Ls) * 0.76$
 - S2 = annual federal Tier 2 support for a state
 - S1 = annual federal Tier 1 support for a state
 - Cs = total annual line weighted statewide cost
 - B = benchmark
 - the constant 12 annualizes the monthly benchmark
 - Ls = number of lines in a state
 - the constant 0.76 converts total cost to intrastate cost
- Eight states (AL, KY, ME, MS, MT, VT, WV, WY) have statewide average costs in excess of \$28.20 and therefore would receive Tier 2 support

Combining Tier 1 And Tier 2



States' Roles in Ensuring Reasonable Comparability

- The Court found the FCC has an obligation to give states sufficient inducements to ensure comparable rates
- Qwest's Solution: Within two years, a State's federal USF support should be conditioned on reasonable comparability of rates and the removal of implicit support in a revenue neutral manner
 - Align intrastate switched access rates to the interstate rate
 - Business and residential rates must be equalized to cover costs, less federal and state universal service support
 - Average rural rates are within 150% of average urban rates

Proposed Timeline

- 1/1/2003: Support is made available to carriers. If a state receives less federal support than under the current plan, a hold-harmless provision will be in place for a year
- 1/1/2004: Hold-harmless is phased out and all states receive support under Qwest's 2 tiered proposal
- 1/1/2005: States begin annual self-certification of reasonable comparability for continued eligibility for federal support

Qwest's Solution Satisfies the Court's Remand and the Act

$$\begin{array}{c} \text{Sufficient Fund Size} \\ + \text{State inducements} \\ = \\ \text{Reasonably Comparable Rates} \end{array}$$

Tier 1 Calculation

State	Company	Monthly Support	Annual Support	Percentage
AK	Anchorage Tel Util	\$ 15,869	\$ 190,432	0.02%
AL	Contel Of The South DbA GTE South	\$ 527,230	\$ 6,326,763	0.67%
AL	GTE And Contel Of Alabama	\$ 355,851	\$ 4,270,213	0.45%
AL	South Central Bell-AL	\$ 318,568	\$ 3,822,816	0.41%
AR	Southwestern Bell-Arkansas	\$ 795,727	\$ 9,548,719	1.02%
AZ	Mountain Bell-Arizona	\$ 579,769	\$ 6,957,226	0.74%
CA	Contel Of California - California	\$ 1,201,322	\$ 14,415,864	1.53%
CA	GTE Of California	\$ 265,760	\$ 3,189,122	0.34%
CA	Pacific Bell	\$ 1,203,630	\$ 14,443,566	1.54%
CA	Roseville Telephone Company	\$ -	\$ -	0.00%
CO	Mountain Bell-Colorado	\$ 502,944	\$ 6,035,322	0.64%
CT	Southern New England Tel	\$ 976	\$ 11,717	0.00%
DC	C&P Telephone Company Of WA DC	\$ -	\$ -	0.00%
DE	Diamond State Tel Co	\$ 6,841	\$ 82,086	0.01%
FL	Central Tel Co Of Florida	\$ 214,753	\$ 2,577,039	0.27%
FL	GTE Florida Inc	\$ 24,814	\$ 297,766	0.03%
FL	Southern Bell-FL	\$ 85,461	\$ 1,025,529	0.11%
FL	United Tel Co Of Florida	\$ 66,244	\$ 794,926	0.08%
GA	Southern Bell-GA	\$ 198,938	\$ 2,387,250	0.25%
HI	GTE Hawaiian Telephone Co Inc	\$ 71,541	\$ 858,495	0.09%
IA	Northwestern Bell-IA	\$ 134,375	\$ 1,612,502	0.17%
ID	Mountain Bell-Idaho	\$ 289,582	\$ 3,474,984	0.37%
IL	Contel Of Illinois Inc DbA GTE - Illinois	\$ 893,478	\$ 10,721,738	1.14%
IL	GTE Of Illinois	\$ 948,399	\$ 11,380,792	1.21%
IL	Illinois Bell Tel Co	\$ 197,819	\$ 2,373,825	0.25%
IN	Contel Of Indiana Inc DbA GTE - Indiana	\$ 236,776	\$ 2,841,313	0.30%
IN	GTE Of Indiana	\$ 290,304	\$ 3,483,649	0.37%
IN	Indiana Bell Tel Co	\$ 174,367	\$ 2,092,409	0.22%
KS	Southwestern Bell-Kansas	\$ 388,918	\$ 4,667,017	0.50%
KY	Cincinnati Bell-KY	\$ 16,940	\$ 203,281	0.02%
KY	GTE South Inc - Kentucky	\$ 187,967	\$ 2,255,602	0.24%
KY	South Central Bell-KY	\$ 395,738	\$ 4,748,854	0.50%
LA	South Central Bell-LA	\$ 1,062,575	\$ 12,750,905	1.36%
MA	New England Tel-MA	\$ 66,256	\$ 795,072	0.08%
MD	C And P Tel Co Of MD	\$ 73,825	\$ 885,899	0.09%
ME	New England Tel-Maine	\$ 612,571	\$ 7,350,856	0.78%
MI	GTE North Inc-MI	\$ 367,393	\$ 4,408,717	0.47%
MI	Michigan Bell Tel Co	\$ 465,282	\$ 5,583,382	0.59%
MN	Contel Of Minnesota Inc DbA GTE Minnesota	\$ 1,239,399	\$ 14,872,791	1.58%
MN	Northwestern Bell-Minnesota	\$ 709,363	\$ 8,512,358	0.91%
MO	Contel Missouri DBA GTE Missouri	\$ 1,991,752	\$ 23,901,022	2.54%
MO	GTE North Inc - Missouri	\$ 338,714	\$ 4,064,565	0.43%
MO	Southwestern Bell-Missouri	\$ 897,740	\$ 10,772,885	1.15%
MS	South Central Bell-Mississippi	\$ 1,899,205	\$ 22,790,461	2.42%
MT	Mountain Bell-Montana	\$ 703,680	\$ 8,444,156	0.90%
NC	Carolina Tel And Tel Co	\$ 311,471	\$ 3,737,650	0.40%
NC	Central Tel Co-NC	\$ 22,616	\$ 271,397	0.03%
NC	Contel Of North Carolina DbA GTE No Carolina	\$ 119,942	\$ 1,439,299	0.15%
NC	GTE South Inc - North Carolina	\$ -	\$ -	0.00%
NC	North State Tel Co-NC	\$ -	\$ -	0.00%
NC	Southern Bell-NC	\$ 47,019	\$ 564,228	0.06%
ND	Northwestern Bell-North Dakota	\$ 284,141	\$ 3,409,696	0.36%
NE	Lincoln Tel And Tele Co	\$ 769,878	\$ 9,238,536	0.98%
NE	Northwestern Bell-Nebraska	\$ 455,174	\$ 5,462,086	0.58%
NH	New England Tel-NH	\$ 152,138	\$ 1,825,656	0.19%

Tier 1 Calculation

State	Company	Monthly Support	Annual Support	Percentage
NJ	New Jersey Bell	\$ -	\$ -	0.00%
NM	Mountain Bell-New Mexico	\$ 418,601	\$ 5,023,207	0.53%
NV	Central Telephone Company - Nevada	\$ 149,268	\$ 1,791,218	0.19%
NV	Nevada Bell	\$ 1,290,916	\$ 15,490,992	1.65%
NY	New York Tel	\$ 545,625	\$ 6,547,502	0.70%
NY	Rochester Telephone Corp	\$ -	\$ -	0.00%
OH	Cincinnati Bell-Ohio	\$ 4,592	\$ 55,104	0.01%
OH	GTE North Inc-OH	\$ 384,013	\$ 4,608,155	0.49%
OH	Ohio Bell Tel Co	\$ 178,264	\$ 2,139,167	0.23%
OH	United Tel Co Of Ohio	\$ 216,940	\$ 2,603,276	0.28%
OK	GTE Southwest Inc - Oklahoma	\$ 137,050	\$ 1,644,603	0.17%
OK	Southwestern Bell-Oklahoma	\$ 814,530	\$ 9,774,365	1.04%
OR	GTE Of The Northwest	\$ 156,742	\$ 1,880,902	0.20%
OR	Pacific Northwest Bell-Oregon	\$ 166,951	\$ 2,003,412	0.21%
PA	Bell Of Pennsylvania	\$ 230,742	\$ 2,768,903	0.29%
PA	GTE North Inc-PA and Contel	\$ 109,666	\$ 1,315,987	0.14%
PR	P R T C - Central	\$ -	\$ -	0.00%
PR	Puerto Rico Tel Co	\$ 7,619	\$ 91,430	0.01%
RI	New England Tel-RI	\$ -	\$ -	0.00%
SC	GTE South Inc - South Carolina	\$ 65,465	\$ 785,583	0.08%
SC	Southern Bell-SC	\$ 84,170	\$ 1,010,037	0.11%
SD	Northwestern Bell-South Dakota	\$ 335,939	\$ 4,031,266	0.43%
TN	South Central Bell-TN	\$ 330,840	\$ 3,970,079	0.42%
TN	United Inter-mountain Tel Co-TN	\$ 8,110	\$ 97,317	0.01%
TX	Central Telephone Company Of Texas	\$ 447,279	\$ 5,367,348	0.57%
TX	Contel Of Texas Inc DbA GTE Texas	\$ 2,258,820	\$ 27,105,838	2.88%
TX	GTE Southwest Inc - Texas	\$ 2,089,654	\$ 25,075,852	2.67%
TX	Southwestern Bell-Texas	\$ 1,394,109	\$ 16,729,308	1.78%
UT	Mountain Bell-Utah	\$ 223,449	\$ 2,681,383	0.29%
VA	C And P Tel Co Of VA	\$ 309,437	\$ 3,713,241	0.39%
VA	Central Tel Co Of VA	\$ 342,227	\$ 4,106,721	0.44%
VA	Contel Of Virginia Inc DbA GTE Virginia	\$ 500,056	\$ 6,000,674	0.64%
VA	United Inter-mountain Tel Co-VA	\$ 195,143	\$ 2,341,712	0.25%
VT	New England Tel-VT	\$ 401,335	\$ 4,816,023	0.51%
WA	GTE Northwest Inc - Washington	\$ 319,411	\$ 3,832,931	0.41%
WA	Pacific Northwest Bell-Washington	\$ 224,056	\$ 2,688,667	0.29%
WI	GTE North Inc-WI	\$ 603,817	\$ 7,245,801	0.77%
WI	Wisconsin Bell	\$ 61,210	\$ 734,526	0.08%
WV	C And P Tel Co Of W VA	\$ 591,323	\$ 7,095,872	0.75%
WY	Mountain Bell-Wyoming	\$ 409,606	\$ 4,915,273	0.52%
	TOTAL		\$ 470,256,107	

Tier 2 Calculation

	Urban Average	\$18.80	50%	Tier 2 Benchmark %	Benchmark at \$28.20
State	Total Switched Lines	Total Monthly Cost After Tier 1 Support	State Average After Tier 1 Support	% Above Urban Average	Support Required
AK	154,647	\$3,194,788.66	\$ 20.66	10%	\$ -
AL	2,159,707	\$71,495,150.47	\$ 33.10	76%	\$ 96,593,687
AR	960,914	\$25,754,777.62	\$ 26.80	43%	\$ -
AZ	2,719,294	\$55,496,301.21	\$ 20.41	9%	\$ -
CA	22,285,906	\$437,681,171.07	\$ 19.64	4%	\$ -
CO	2,651,630	\$59,317,266.06	\$ 22.37	19%	\$ -
CT	2,284,859	\$54,613,227.89	\$ 23.90	27%	\$ -
DC	980,551	\$15,887,642.04	\$ 16.20	-14%	\$ -
DE	559,794	\$12,368,527.43	\$ 22.09	18%	\$ -
FL	10,610,156	\$229,267,188.87	\$ 21.61	15%	\$ -
GA	4,033,339	\$93,410,885.42	\$ 23.16	23%	\$ -
HI	716,211	\$15,264,356.02	\$ 21.31	13%	\$ -
IA	1,113,218	\$25,909,027.56	\$ 23.27	24%	\$ -
ID	528,261	\$13,686,944.41	\$ 25.91	38%	\$ -
IL	7,653,397	\$163,802,471.31	\$ 21.40	14%	\$ -
IN	3,109,304	\$79,614,716.29	\$ 25.61	36%	\$ -
KS	1,351,910	\$32,165,375.03	\$ 23.79	27%	\$ -
KY	1,800,020	\$55,691,276.95	\$ 30.94	65%	\$ 44,968,102
LA	2,286,650	\$62,150,295.64	\$ 27.18	45%	\$ -
MA	4,411,630	\$84,751,503.06	\$ 19.21	2%	\$ -
MD	3,688,106	\$77,075,159.52	\$ 20.90	11%	\$ -
ME	668,153	\$21,421,524.83	\$ 32.06	71%	\$ 23,526,045
MI	5,945,915	\$144,466,498.79	\$ 24.30	29%	\$ -
MN	2,402,305	\$57,098,098.70	\$ 23.77	26%	\$ -
MO	2,858,071	\$75,958,221.27	\$ 26.58	41%	\$ -
MS	1,247,567	\$47,802,144.77	\$ 38.32	104%	\$ 115,101,289
MT	362,570	\$10,737,026.21	\$ 29.61	58%	\$ 4,674,476
NC	4,157,819	\$114,602,965.04	\$ 27.56	47%	\$ -
ND	253,381	\$6,281,795.00	\$ 24.79	32%	\$ -
NE	808,955	\$21,631,034.31	\$ 26.74	42%	\$ -
NH	769,880	\$20,243,495.68	\$ 26.29	40%	\$ -
NJ	6,348,573	\$122,545,748.10	\$ 19.30	3%	\$ -
NM	787,901	\$19,611,292.74	\$ 24.89	32%	\$ -
NV	1,178,639	\$22,751,224.03	\$ 19.30	3%	\$ -
NY	11,334,782	\$212,695,898.02	\$ 18.76	0%	\$ -
OH	6,204,821	\$152,590,421.80	\$ 24.59	31%	\$ -
OK	1,733,722	\$44,253,901.04	\$ 25.53	36%	\$ -
OR	1,852,964	\$42,470,673.18	\$ 22.92	22%	\$ -
PA	6,837,008	\$150,220,363.25	\$ 21.97	17%	\$ -
PR	1,083,802	\$29,983,076.54	\$ 27.66	47%	\$ -
RI	648,885	\$13,554,966.89	\$ 20.89	11%	\$ -
SC	1,612,240	\$44,795,340.52	\$ 27.78	48%	\$ -
SD	275,570	\$7,072,337.33	\$ 25.66	37%	\$ -
TN	2,865,606	\$78,293,578.65	\$ 27.32	45%	\$ -
TX	11,477,745	\$260,075,673.75	\$ 22.66	21%	\$ -
UT	1,094,308	\$22,146,992.65	\$ 20.24	8%	\$ -
VA	4,472,486	\$109,983,808.78	\$ 24.59	31%	\$ -
VT	315,612	\$10,999,122.40	\$ 34.85	85%	\$ 19,141,640
WA	3,280,515	\$69,603,564.66	\$ 21.22	13%	\$ -
WI	2,604,628	\$67,160,272.74	\$ 25.78	37%	\$ -
WV	813,903	\$28,260,196.54	\$ 34.72	85%	\$ 48,410,163
WY	241,197	\$7,609,072.67	\$ 31.55	68%	\$ 7,362,734
				Total:	\$ 359,778,136

Combined Impact of Tier 1 and Tier 2

State	Tier 1	Tier 2	Support Payment
AK	\$ 190,432	\$ -	\$ 190,432
AL	\$ 14,419,792	\$ 96,593,687	\$ 111,013,479
AR	\$ 9,548,719	\$ -	\$ 9,548,719
AZ	\$ 6,957,226	\$ -	\$ 6,957,226
CA	\$ 32,048,551	\$ -	\$ 32,048,551
CO	\$ 6,035,322	\$ -	\$ 6,035,322
CT	\$ 11,717	\$ -	\$ 11,717
DC	\$ -	\$ -	\$ -
DE	\$ 82,086	\$ -	\$ 82,086
FL	\$ 4,695,260	\$ -	\$ 4,695,260
GA	\$ 2,387,250	\$ -	\$ 2,387,250
HI	\$ 858,495	\$ -	\$ 858,495
IA	\$ 1,612,502	\$ -	\$ 1,612,502
ID	\$ 3,474,984	\$ -	\$ 3,474,984
IL	\$ 24,476,354	\$ -	\$ 24,476,354
IN	\$ 8,417,371	\$ -	\$ 8,417,371
KS	\$ 4,667,017	\$ -	\$ 4,667,017
KY	\$ 7,207,736	\$ 44,968,102	\$ 52,175,839
LA	\$ 12,750,905	\$ -	\$ 12,750,905
MA	\$ 795,072	\$ -	\$ 795,072
MD	\$ 885,899	\$ -	\$ 885,899
ME	\$ 7,350,856	\$ 23,526,045	\$ 30,876,901
MI	\$ 9,992,098	\$ -	\$ 9,992,098
MN	\$ 23,385,149	\$ -	\$ 23,385,149
MO	\$ 38,738,472	\$ -	\$ 38,738,472
MS	\$ 22,790,461	\$ 115,101,289	\$ 137,891,750
MT	\$ 8,444,156	\$ 4,674,476	\$ 13,118,632
NC	\$ 6,012,574	\$ -	\$ 6,012,574
ND	\$ 3,409,696	\$ -	\$ 3,409,696
NE	\$ 14,700,623	\$ -	\$ 14,700,623
NH	\$ 1,825,656	\$ -	\$ 1,825,656
NJ	\$ -	\$ -	\$ -
NM	\$ 5,023,207	\$ -	\$ 5,023,207
NV	\$ 17,282,211	\$ -	\$ 17,282,211
NY	\$ 6,547,502	\$ -	\$ 6,547,502
OH	\$ 9,405,702	\$ -	\$ 9,405,702
OK	\$ 11,418,968	\$ -	\$ 11,418,968
OR	\$ 3,884,314	\$ -	\$ 3,884,314
PA	\$ 4,084,890	\$ -	\$ 4,084,890
PR	\$ 91,430	\$ -	\$ 91,430
RI	\$ -	\$ -	\$ -
SC	\$ 1,795,619	\$ -	\$ 1,795,619
SD	\$ 4,031,266	\$ -	\$ 4,031,266
TN	\$ 4,067,395	\$ -	\$ 4,067,395
TX	\$ 74,278,347	\$ -	\$ 74,278,347
UT	\$ 2,681,383	\$ -	\$ 2,681,383
VA	\$ 16,162,348	\$ -	\$ 16,162,348
VT	\$ 4,816,023	\$ 19,141,640	\$ 23,957,663
WA	\$ 6,521,598	\$ -	\$ 6,521,598
WI	\$ 7,980,327	\$ -	\$ 7,980,327
WV	\$ 7,095,872	\$ 48,410,163	\$ 55,506,035
WY	\$ 4,915,273	\$ 7,362,734	\$ 12,278,006
TOTAL	\$ 470,256,107	\$ 359,778,136	\$ 830,034,243